

### **REMARKS**

In view of the amendments proposed above, Applicants respectfully request consideration of the following remarks.

#### **Anticipation Rejections Under 35 U.S.C. § 102**

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

#### **Anticipation Rejection Based on Linux**

Claims 1-35 were rejected under 35 U.S.C. § 102(b) as being anticipated by Linux, as described in Rubini et al., *Linux Device Drivers*, 2<sup>nd</sup> Ed., June 2001 (hereinafter “Rubini”). Applicants respectfully traverse this rejection as set forth below.

The independent claims have been amended to clarify that the claimed invention is directed to a driver having at least two different deferred procedure calls for processing interrupts associated with the same source, wherein the different deferred procedure calls are for processing different types of interrupt events. Support for these amendments can be found at paragraphs 0024 and 0025 of the as-filed specification.

The references relied upon by the Examiner are directed to drivers (and deferred procedure calls) for different devices (e.g., “linux/drivers/net/sis900.c” and “linux/drivers/char/pc\_keyb.c”) rather than for the same source of interrupts. Further,

these references do not disclose two different deferred procedure call for handling different types of interrupt events associated with the same source (e.g., a peripheral device).

In summary, the cited references fail to disclose at least the above-noted limitations of the independent claims – i.e., claims 1, 8, 12, 15, 20, and 27 – and each of the independent claims is novel in view of the cited references. Also, claims 2-7 and 31 are allowable as depending from novel independent claim 1, claims 9-11 and 32 are allowable as depending from novel independent claim 8, claims 13-14 and 33 are allowable as depending from novel independent claim 12, claims 16-19 are allowable as depending from novel independent claim 15, claims 21-26 and 34 are allowable as depending from novel independent claim 20, and claims 28-30 and 35 are allowable as depending from novel independent claim 27.

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**CONCLUSION**

Applicants submit that claims 1-35 are in condition for allowance and respectfully requests allowance of such claims.

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Respectfully submitted,

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